

AC:nab

AO 91 (Rev. 11/11) Criminal Complaint

2020R00239

# UNITED STATES DISTRICT COURT

for the

District of Minnesota

UNITED STATES OF AMERICA

v.

Case No. 20-mj-343 BRT

(1) GARRETT PATRICK ZIEGLER  
(2) FORNANDOUS CORTEZ HENDERSON

## CRIMINAL COMPLAINT

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about May 29, 2020, in Dakota County, in the State and District of Minnesota, the defendants, Garrett Patrick Ziegler and Fornandous Cortez Henderson: (1) each aiding and abetting the other, maliciously damaged, by means of fire and explosive materials, the Dakota County Western Service Center located at 14955 Galaxie Avenue, Apple Valley, Minnesota 55124, a building used in interstate commerce, and one possessed by or leased to institutions or organizations that receive federal funding, in violation of Title 18, United States Code, Sections 2 and 844(i); and (2) each aiding and abetting the other, knowingly and intentionally possessed firearms, namely, Molotov cocktails (destructive devices), that were not registered to them in the National Firearms Registration and Transfer Record, in violation of Title 26, United States Code, Section 5861(d), and Title 18, United States Code, Section 2.

I further state that I am an ATF Special Agent and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

SUBSCRIBED and SWORN before me  
by reliable electronic means (FaceTime and email)  
pursuant to Fed. R. Crim. P. 41(d)(3).


Date: June 1, 2020

City and State: St. Paul, MN

  
Complainant's signature

Sara Thomas, ATF Special Agent

Printed name and title

  
Judge's Signature

The Honorable Becky R. Thorson  
United States Magistrate Judge

Printed Name and Title